

m/037/088



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab Field Office
82 East Dogwood Avenue
Moab, Utah 84532



3809
(UT-062)

NOV 12 1999

Mr. Robert A. Prescott
Vice President, Summo USA Corporation
P.O. Box 847
Moab, Utah 84532

Re: Need for Joint Field Inspection, Plan of Operations UTU-72499 (amendment), San Juan County, Utah. UDOGM file # M/037/088.

Dear Mr. Prescott:

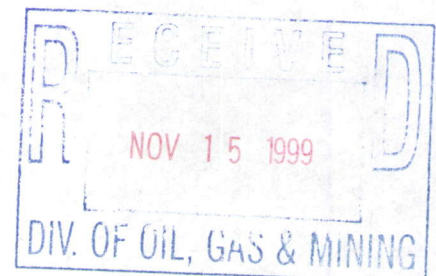
During a field inspection conducted on November 8, 1999 by members of my staff, a number of project-related land surface disturbances, not described in the proposed action, were observed; this work includes, but is not necessarily limited to, the following:

- (A) Access trails that lead to (and slightly beyond) drill sites A (State land) and H (Federal land) have been, at the very minimum, substantially upgraded; in addition, the site A access road has, in places been widened considerably in excess of approximately 14', which is the proposed action width.
- (B) At sites C, D, and E, project-related land surface disturbances are considerably in excess of those contained in the proposed action.

Conducting unauthorized land surface disturbances on Federal lands constitute grounds for issuance of a notice of non-compliance (see 43 CFR 3809.3-2). We suggest that you arrange, at the earliest date possible, a field inspection of the UTU-72499 (amendment) area with our office in order that we might resolve this matter in a manner that is consistent with the 43 CFR 3809 surface management regulations as well as with UDOGM rules and regulations. If you have questions, please contact Sal Venticinque at this office, (435) 259-2141.

Sincerely,

Assistant Field Manager
Division of Resources



cc: Mr. Lee Gochnour
Gochnour & Associates, Inc.
5231 South Quebec
Greenwood Village, Colorado 80111

Mr. Will Stokes
Utah School and Institutional Trust Lands Administration (SITLA)
675 East 500 South, Suite 500
Salt Lake City, Utah 84102

Mr. Anthony A. Gallegos ✓
Utah Department of Natural Resources
Division of Oil, Gas and Mining (UDOGM)
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801